

### **REMARKS**

Claims 1-20 are pending in the instant application and stand rejected by the examiner. Claims 1 and 11 are independent claims. The assignee traverses the rejections of the pending claims.

#### ***Claim Rejections 35 U.S. C. § 112***

Claims 1-20 stand rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Assignee respectfully disagrees with this position. However, in the interest of expediting prosecution, claims 1, 4, 9, 11, and 18 have been amended to recite features for scenarios where the “if condition” is not satisfied. This amendment is supported by FIG. 4 of the application at issue at 78. In light of these amendments, it is respectfully requested that the § 112 rejections of claims 1-20 be withdrawn.

#### ***Claim Rejections – 35 U.S.C. §§ 102, 103***

Claims 1-6, 8, and 11-14 stand rejected under 35 U.S.C. § 103(a) as being anticipated by Sweet et al. (U.S. Patent Publication No. 2002/0031230) in view of Albert (U.S. Patent Publication No. 2003/0177389). Claims 7 and 15-17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sweet, in view of Albert, in view of Satagopan et al. (U.S. Patent Publication No. 2002/0095497). Claims 9, 10, and 18-20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Sweet in view of Albert in view of Freund (U.S. Patent No. 5,987,611). Reconsideration is respectfully requested in light of the amendments and remarks contained herein.

Claim 1 recites a plurality of domains containing assets of a wireless mobile device and a domain controller for controlling access to the assets within the domains. Claim 1 has been

amended to further define a domain. Claim 1 now recites a plurality of domains residing on a wireless mobile device, at least one domain including a *plurality of different types of assets* of the mobile communication device, the different types of assets within a domain *requiring a common level of trust to access*. This amendment is supported throughout the specification including by FIG. 2 of the application at issue and paragraph [0030]. (Claim 21 has been added to recite example types of assets. These examples are shown in FIG. 2.)

It is respectfully submitted that the cited references do not teach or suggest the domains containing a plurality of different types of assets that require a common level of trust to access. For example, Sweet discloses the PXa<sup>3</sup> server system, where a user is issued an encryption key for encrypting and decrypting objects. *See* Sweet, paragraph [0116]. There is no division of assets of a mobile device into domains as required by claim 1. The domains of Sweet are completely different that the claimed domains in that a network user in Sweet is a member of one or more domains. *See* Sweet, Abstract, lines 6-8. In contrast, a domain in claim 1 contains assets of a mobile device, not network users. Thus, Sweet does not teach or suggest the claimed plurality of domains residing on a wireless mobile communication device where at least one domain includes a plurality of different types of assets of the wireless mobile communication device that require a common level of trust to access.

The claimed domain structure is also not taught or suggested in Albert. Albert teaches a system that allows for storing different security policies and settings for end-user devices connecting to various entities or networks. There is no division of assets of a mobile into domains as required by claim 1. The cited client security module 320 of FIG. 3 enforces different security protocols depending on to which entity a device is communicating. There is no division of device assets into domain groups requiring a common level or trust to access.

Because the cited portions of the references fail to teach or suggest the features of amended claim 1, it is respectfully requested that the § 103 rejection of claim 1 be withdrawn. Similar amendments have been made to independent claim 11, and claim 11 is rejected for similar reasons as claim 1. In light of the amendments to claim 11, it is respectfully requested that the § 103 rejection of claim 11 be withdrawn for similar reasoning as offered for claim 1.

Assignee also objects to the combination of Sweet and Albert. Sweet teaches a system that must be used on a server. The PXa<sup>3</sup> server holds all private keys and certificates for all users to which a user may login and access. The PXa<sup>3</sup> server of Sweet would not work on a mobile device as required by claim 1. The client security module 320 of FIG. 3 of Albert could function on a mobile device. However, it is a very different system than the PXa<sup>3</sup> server of Sweet. The PXa<sup>3</sup> server of Sweet and the client security module 320 of Albert are not interchangeable, and the office has made no allegation that the client security module of Albert performs any of the required functionality of claim 1. The outstanding office action states that “it would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified the teachings of Sweet with the teachings of Albert, for the purpose of storing different security policies and settings for end-user devices connecting to various entities or networks, as explicitly taught by Albert: ¶ 14.” While Sweet and Albert might be combinable such that a system with a PXa<sup>3</sup> server interacts with a mobile device containing a client security module, this system would not meet the claim language having a domain controller with the required functionality on the mobile device. Because the PKa<sup>3</sup> server of Sweet cannot be placed on a mobile device, the cited references would not enable one skilled in the art to provide the claimed functionality in a domain controller on the mobile device. Because the cited references would not enable one

skilled in the art to generate the system of claim 1, it is respectfully submitted that claim 1 is allowable over these references.

Claim 21 has been added. Claim 21 is supported by FIG. 2 which depicts communication pipes, persistent data, properties, and software applications belonging to domains. It is respectfully submitted that the cited references do not teach or suggest the features of claim 21.

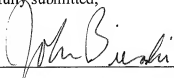
Arguments have not been provided at this time in support of the patentability of the dependent claims. It is respectfully submitted that because the independent claims are now in condition for allowance, the dependent claims which depend directly or indirectly therefrom are also in condition for allowance. However, assignee reserves the right to argue the patentability of certain of the dependent claims in the instant application at a future time, should that become necessary.

### CONCLUSION

For the foregoing reasons, the assignee respectfully submits that the pending claims are allowable. Therefore, the assignee respectfully requests that the examiner pass this case to issuance.

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Respectfully submitted,

By: 

John V. Biernacki  
Reg. No. 40,511  
Jones Day  
North Point; 901 Lakeside Avenue  
Cleveland, OH 44114  
(216) 586-3939